

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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STEVEN EMERSON,

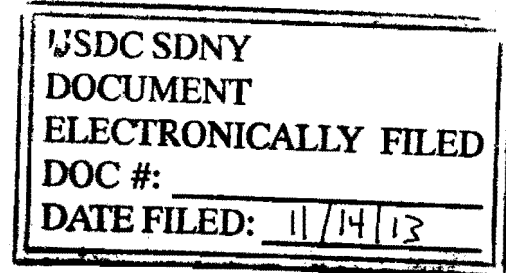
Plaintiff,

12 Civ.8849 (TPG)

-against-

CYRUS McGOLDRICK,

Defendant.
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SETTLEMENT AGREEMENT AND ORDER OF DISMISSAL

It is hereby stipulated and agreed between the parties, acting by their attorneys, that the within captioned matter shall be settled upon the following terms and conditions:

1. Defendant shall post the following statement via his twitter account:

"Statement of Apology in the Resolution of *Emerson v. McGoldrick*, No. 12-civ-8849 (S.D.N.Y. 2012), please click LINK."

The message on the LINK shall read:

"In December 2012 I referred to Steven Emerson in a tweet as being 'an unindicted co-conspirator in the largest child pornography case in US history.' That statement was false. I simply was responding in an ironic way to Mr. Emerson's repeated references to CAIR as an 'unindicted co-conspirator in the largest terrorist money laundering case in US history.' I did not, and do not, have any information regarding Emerson's involvement in any child pornography case and I did not intend to suggest that I did. I sincerely apologize to Mr. Emerson for any upset this has caused him."

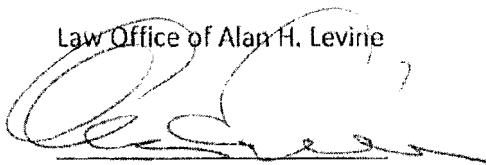
-2-

2. Defendant agrees to leave the above statement and message posted without deletion for as long as the tweet which is the subject matter of this litigation remained prior to its deletion. Neither defendant nor anyone acting on his behalf or at his behest will make any public statement that contradicts the statement set out in Paragraph 1 hereinabove.

3. In consideration of this retraction and apology, Plaintiff hereby dismisses with prejudice the within action. Each party waives any claim either has against the other as a result of the matters set forth in this litigation, each shall bear his own costs, and each is satisfied with this resolution.

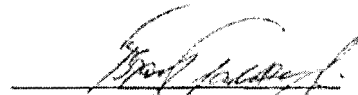
Dated: New York, New York
November 8, 2013

Law Office of Alan H. Levine



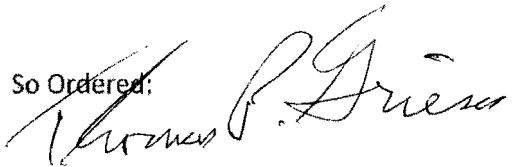
Alan Levine Esq.
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99 Hudson Street, 14th Floor
New York, N.Y. 10013

Law Offices of Frank Taddeo Jr.



Frank Taddeo Jr.
Local Counsel for Plaintiff
100 Wall Street, 23rd Floor
New York, N.Y. 10005

So Ordered:



United States District Judge
November 14th, 2013